

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,  Plaintiff,  v.  GOOGLE LLC,  Defendant.	  Civil Action No. 2:17-cv-00442-JRG  LEAD CASE  <b>JURY TRIAL DEMANDED</b>
SEVEN NETWORKS, LLC,  Plaintiff,  v.  SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS CO., LTD.,  Defendants.	  Civil Action No. 2:17-cv-00441-JRG  CONSOLIDATED CASE

**JOINT MOTION FOR ENTRY OF ORDER FOCUSING  
PATENT CLAIMS AND PRIOR ART**

Plaintiff SEVEN Networks, LLC and Defendants Google LLC, Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. submit this joint motion for entry of an order focusing patent claims and prior art. As outlined in the order, this joint motion seeks to limit the number of patent claims and prior art asserted in the case in order to streamline the issues in the case.

Specifically, SEVEN has already voluntarily narrowed the number of asserted claims on July 23, 2018 in its Preliminary Election of Asserted Claims. On July 30, 2018, each Defendant has voluntarily narrowed the number of prior art references in their Preliminary Election of Asserted Prior Art. Not later than 7 days before the service of expert reports by the party with the burden of proof on an issue, SEVEN agrees to serve a Final Election of Asserted Claims, further narrowing the number of asserted claims as outlined in the attached order. Finally, by the date set for the service of expert reports by the party with the burden of proof on an issue, each Defendant agrees to serve a Final Election of Asserted Prior Art, further narrowing the number of prior art references as outlined in the attached order.

Dated: August 27, 2018

Respectfully submitted,

/s/ Max Ciccarelli (w/ permission)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 27, 2018 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Charles K. Verhoeven  
Charles K. Verhoeven

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that Plaintiff SEVEN Networks, LLC and Defendants Google LLC, Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. met and conferred by email and phone on the issues. The parties reached an agreement on the issues.

/s/ Brian E. Mack